1 The Honorable John C. Coughenour 2 3 4 5 6 7 UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 10 UNITED STATES OF AMERICA, NO. CR16-062JCC 11 Plaintiff, **GOVERNMENT'S SUR-REPLY TO** 12 CORPORATE DEFENDANTS' 13 MOTION TO CONTINUE v. 14 ANGELAKOS (HELLAS) S.A., 15 GALLIA GREACA SHIPPING LTD, KONSTANTINOS CHRYSOVERGIS, and 16 TRYFON ANGELOU, 17 18 Defendants. 19 20 The government opposes the motion of Angelakos (Hellas) S.A. and Gallia 21 Graeca, LTD (the "Corporate Defendants") to continue the trial from June 6, 2016 to 22 June 20, 2016. See Dkt. No. 47. In the event the Court is inclined to grant a continuance, 23 the government, having reviewed defendant's reply brief, suggests that trial begin on 24 June 13, 2016. 25 The government notes that corporate counsel is scheduled to return from his 26 international business trip on June 10, 2016. Dkt. No 51 n.1. While the government 27 strongly prefers to start trial on June 6, 2016, it would be available to start trial on June 28

13, 2016 and understands this date may be available on the Court's calendar. It would 2 also be possible to start trial mid-week during the week of June 13, but the trial would 3 need to start on or before Wednesday, June 15, 2016 to ensure that the trial concludes the 4 week of June 20. Mr. Chalos has advised undersigned counsel that he does not object to 5 starting trial the week of June 13, 2016, but would need until June 16, 2016 to travel to 6 this district and be prepared for trial. 7 DATED this 26th day of April, 2016. 8 9 10 Respectfully submitted, 11 ANNETTE L. HAYES United States Attorney 12 13 s/ Seth Wilkinson SETH WILKINSON 14 Assistant United States Attorney 15 Seattle, Washington 98101-1271 700 Stewart Street, Suite 5220 16 Telephone: (206) 553-4259 17 Facsimile: (206) 553-0755 E-Mail: seth.wilkinson@usdoj.gov 18 19 20 s/ Matthew D. Diggs 21 MATTHEW D. DIGGS Assistant United States Attorney 22 United States Attorney's Office 23 700 Stewart Street, Suite 5220 Seattle, Washington 98101 1271 24 Telephone: (206) 553 2260 Facsimile: (206) 553 2502 25 E-Mail: matthew.diggs@usdoj.gov 26 27 28

1 **CERTIFICATE OF SERVICE** 2 I hereby certify that on April 26th, I electronically filed the foregoing with the 3 Clerk of the Court using the CM/ECF system, which will send notification of such filing 4 to the attorney of record for Defendant. 5 6 s/Jennifer J. Witt 7 JENNIFER J. WITT 8 Legal Assistant United States Attorney's Office 9 700 Stewart Street, Suite 5220 10 Seattle, Washington 98101-1271 Phone: 206-553-2520 11 Fax: 206-553-2502 12 E-mail: Jennifer.Witt@usdoj.gov 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28